

In re Terrorist Attacks on September 11, 2001

As relates to: 03 MDL 1570 (GBD) (SN)

BAKAHITYAR KAMARDINOVA, et al.

Civil Docket Number: 18-cv-05339

PLAINTIFFS,

**SECOND NOTICE OF AMENDMENT**

v.

ISLAMIC REPUBLIC OF IRAN,

ECF CASE

DEFENDANT.

This document relates to:

*Bakahityar Kamardinova, et al. v. Islamic Republic of Iran, No. 1:18-cv-05339 (GBD) (SN).*

Plaintiffs file this Notice of Amendment with respect to the underlying Complaint in the above-referenced matter, ECF No. 6 (the “Underlying Complaint”), as permitted and approved by the Court’s Order of May 25, 2018, ECF No. 4010, read with the Order dated April 27, 2018, ECF No. 3982. Upon the filing of this Notice of Amendment, the Underlying Complaint is deemed amended to add the individuals listed below (the “New Plaintiffs”) as plaintiffs raising claims against the Islamic Republic of Iran, and adopting the factual allegations, jurisdictional allegations, and jury trial demand of the Underlying Complaint and *Burnett* Iran Complaint, Docket Number 15-cv-9903 (S.D.N.Y.) (GBD)(SN) (ECF Doc. No. 53), as well as all causes of action specified below. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the Underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

### CAUSES OF ACTION

The New Plaintiffs hereby adopt and incorporate herein by reference the causes of action set forth in the Underlying Complaint and the *Burnett* Iran Complaint, Docket Number 15-cv-9903 (S.D.N.Y.) (GBD)(SN) (ECF Doc. No. 53).

New Plaintiffs are making such claim on the following basis, and incorporate by reference that supplemental information provided in the Identification of New Plaintiffs below, identifying the New Plaintiffs asserted basis for participating in this suit:

- ☐ Estate Wrongful Death Claim by Estate Representative on Behalf of an Individual Killed as a result of the September 11, 2001 Terrorist Attacks
- ☒ Solatium Claim by Immediate Family Member of an Individual Killed as a result of the September 11, 2001 Terrorist Attacks
- ☐ Personal Injury Claim by Individual Injured as a result of the September 11, 2001 Terrorist Attacks

### IDENTIFICATION OF NEW PLAINTIFFS

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the Underlying Complaint discussing the decedent and/or the decedent's estate.

	<b>New Plaintiff's Last Name, First Name</b>	<b>State of Residency at Filing (or death)</b>	<b>Citizenship/ Nationality on 9/11/2001</b>	<b>Decedent's Name (alphabetical by last name)</b>	<b>New Plaintiff's Relationship to Decedent</b>	<b>Paragraphs of Complaint Discussing Decedent</b> <b>18-cv-05339</b>
126	Kuras, Michael	NY	United States	Kuras, Patricia A.	Brother	¶ 27
127	Kyte, Morgan	NJ	United States	Kyte, Angela R.	Son	¶ 28
128	Matthews, Marilyn	NJ	United States	LaPlante, Carol A.	Sister	¶ 31
129	Lauria, Catherine	FL	United States	Lauria, Stephen J.	Sister	¶ 32

	<b>New Plaintiff's Last Name, First Name</b>	<b>State of Residency at Filing (or death)</b>	<b>Citizenship/ Nationality on 9/11/2001</b>	<b>Decedent's Name (alphabetical by last name)</b>	<b>New Plaintiff's Relationship to Decedent</b>	<b>Paragraphs of Complaint Discussing Decedent</b> <b>18-cv-05339</b>
130	Moore-Gooding, Betty	NC	United States	Lawson, Nathaniel	Sister	¶ 33
131	Robinson, Evelyn	GA	United States	Lawson, Nathaniel	Sister	¶ 33
132	Leduc, Elvis	NY	United States	Leduc, Alexis	Son	¶ 34
133	Leduc, Alexia	NY	United States	Leduc, Alexis	Daughter	¶ 34
134	Rivera, Isa	NY	United States	Leduc, Alexis	Spouse	¶ 34
135	Levin, Marvin	PA	United States	Levin, Alisha C.	Father	¶ 40
136	Levin, Audrey	PA	United States	Levin, Alisha C.	Mother	¶ 40
137	Allen Jr., John E.	MD	United States	Lightbourn-Allen, Samantha	Son	¶ 41
138	Butler, Rennea	VA	United States	Lightbourn-Allen, Samantha	Sister	¶ 41
139	Lightbourn, Raymond	MD	United States	Lightbourn-Allen, Samantha	Brother	¶ 41
140	Lopez Feliciano, Michael	FL	United States	Lopes, George	Son	¶ 48
141	Maloy, Gene	VA	United States	Maloy, Gene	Father	¶ 59
142	Martinez, Marie	NY	United States	Martinez, Robert G.	Mother	¶ 62
143	Firth, Francis	NJ	United States	Martinez, Robert G.	Brother	¶ 62
144	Mattic, Vivian	MI	United States	Mattic, Margaret E.	Sister	¶ 69
145	Douglas, Frances	MI	United States	Mattic, Margaret E.	Sister	¶ 69
146	McNeil, Walter	PA	United States	McNeil, Walter A.	Son	¶ 76
147	McNeil, Judith	NY	United States	McNeil, Walter A.	Sister	¶ 76
148	Mello, Douglas	NY	United States	Mello, Christopher D.	Father	¶ 78
149	Mello, John	CT	United States	Mello, Christopher D.	Brother	¶ 78
150	Velazquez, Donna	NY	United States	Moccia, Frank V.	Daughter	¶ 88

Dated: June 4, 2018

Respectfully submitted,

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*COUNSEL FOR PLAINTIFFS*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 24, 2018, I caused the foregoing Notice of Amendment, to be served via the Court's ECF system to all counsel of record in Case Number 03-MDL-1570 (GBD) (SN).



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Jerry S. Goldman